

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA

vs.

GORDON L. HALL
BENTON T. HALL

CR. NO. 6:13-170
18 U.S.C. § 371
18 U.S.C. § 1343
18 U.S.C. § 1349
18 U.S.C. § 981(a)(1)(C)
28 U.S.C. § 2461(c)

INDICTMENT

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COUNT 1

THE GRAND JURY CHARGES:

1. That beginning in or about April 2012, and continuing up and to the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, GORDON L. HALL, BENTON T. HALL, and Wallace Lindsey Howell, a co-conspirator charged elsewhere, knowingly and willfully did combine, conspire, confederate, agree and have a tacit understanding with each other and with others known and unknown to the Grand Jury, to corruptly influence, obstruct and impede the due administration of justice in the investigation and prosecution of United States v. Ronnie Gene Wilson, et al., No. 8:12-320, and in the investigation and prosecution of In re Receiver for Ronnie Gene Wilson, et al., No. 8:12-2078, by the hiding and transferring of assets derived from, or traceable to, proceeds from a Silver Ponzi Scheme operated by Ronnie Gene Wilson, in violation of Title 18, United States Code, Sections 1503 & 2232(a).

Manner and Means

2. It was part of the conspiracy that in an effort maintain the benefit of certain property acquired with the proceeds from a Silver Ponzi Scheme, Wallace Lindsey Howell enlisted the

assistance of GORDON L. HALL and BENTON T. HALL.

3. Howell then transferred property, both real and personal, which had been acquired with proceeds from a Silver Ponzi Scheme, to GORDON L. HALL, BENTON T. HALL, and/or entities and persons controlled by GORDON L. HALL and BENTON T. HALL.

4. In exchange for the receipt of the property, GORDON L. HALL and BENTON T. HALL agreed to pay Wallace Lindsey Howell a stipend for the remainder of Howell's natural life and to assist Howell in legal proceedings related to the Silver Ponzi Scheme and/or the recovery of assets purchased with Ponzi money.

Overt Acts

5. In furtherance of the conspiracy and to effect the objects thereof, the following overt acts, among others, were committed in the District of South Carolina and elsewhere:

a. On or about May 7, 2012, Wallace Lindsey Howell traveled to Arizona to meet with GORDON L. HALL and BENTON T. HALL.

b. On or about June 1, 2012, Wallace Lindsey Howell sold a recreational vehicle and directed the buyer to write a check payable to Gibwell Missions Fleet.

c. On or about June 26, 2012, Wallace Lindsey Howell conveyed real property to GORDON L. HALL and BENTON T. HALL, directors of the Roylin Trust.

d. On or about July 12, 2012, GORDON L. HALL and BENTON T. HALL opened a Bank of America account in the name of Gibwell Missions Fleet LLC.

e. On or about July 27, 2012, GORDON L. HALL and BENTON T. HALL

traveled to South Carolina to meet with Wallace Lindsey Howell.

f. On or about August 13, 2012, BENTON T. HALL sent to Wallace Lindsey Howell via e-mail a "notice" for Howell to send to the United States Secret Service.

g. On or about October 9, 2012, Wallace Lindsey Howell shipped precious metals to GORDON L. HALL.

h. On or about October 9, 2012, Wallace Lindsey Howell notified GORDON L. HALL and BENTON T. HALL via e-mail that a package had been shipped to their home address.

i. On or about October 10, 2012, BENTON T. HALL wrote Wallace Lindsey Howell a check in the amount of \$5,583.33.

j. On or about December 20, 2012, GORDON L. HALL sent Wallace Lindsey Howell four money orders.

All in violation of Title 18, United States Code, Section 371.

COUNTS 2 - 4

THE GRAND JURY FURTHER CHARGES:

1. That beginning in or about April 2012 and continuing up and to the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, GORDON L. HALL, BENTON T. HALL, and Wallace Lindsey Howell, a co-conspirator charged elsewhere, did knowingly and willfully combine, conspire, confederate, agree and have a tacit understanding with each other and with others known and unknown to the Grand Jury, to devise and execute a scheme and artifice to defraud and to obtain money by means of false and fraudulent pretenses,

representations, and promises, and during such period, in the course of executing said scheme and artifice, did knowingly cause to be transmitted by means of wire, radio, or television a communication in interstate commerce, in violation of Title 18, United States Code, Section 1343.

THE SCHEME AND ARTIFICE

2. Paragraphs 2 through 4 of Count 1 of this Indictment are realleged and incorporated herein by reference as if fully set forth herein.

USE OF AN INTERSTATE WIRE

3. On or about the dates set forth below, in the District of South Carolina and elsewhere, the Defendants, GORDON L. HALL, BENTON T. HALL, and Wallace Lindsey Howell, for the purpose of executing the aforesaid scheme and artifice to defraud, knowingly did transmit and caused to be transmitted in interstate commerce the following electronic signals:

<u>Count</u>	<u>Date</u>	<u>Description of Wire Fraud Communication</u>
2	June 25, 2012	Wallace Lindsey Howell sent to Gordon Hall, via e-mail, minutes of the Roylin Trust.
3	June 26, 2012	The Welch Law Firm sent to Gordon Hall, via e-mail, documents relating to the transfer of farm property located in Fountain Inn, South Carolina.
4	August 8, 2012	Wallace Lindsey Howell sent to Benton Hall, via e-mail, flight information and a request for payment.

In violation of Title 18, United States Code, Section 1349.

FORFEITURE

1. Upon conviction for violations of Title 18, United States Code, Sections 371 and 1349, as charged in this Indictment, the Defendants, GORDON L. HALL, BENTON T. HALL, shall forfeit to the United States any property, real or personal, which constitutes or is derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation, and any property traceable to such property.

2. Pursuant to 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the violations charged in this Indictment includes, but is not limited to, the following:

A. **CASH PROCEEDS/MONEY JUDGMENT:**

A sum of money equal to all proceeds the Defendants obtained, directly or indirectly, from the offenses charged in the Indictment, that is, a minimum of approximately \$1,500,000 in United States currency, and all interest and proceeds traceable thereto, including but not limited to the following, for which the Defendants are jointly and severally liable with any and all co-conspirators, including but not limited to, Wallace Lindsey Howell.

B. **REAL PROPERTY:**

1. 881 Old Plantation Road

Fountain Inn, South Carolina, 29644

Laurens County, South Carolina

Titled in the Name of: Hall Gordon & Benton Directors of The Roylin Trust

TMS# 213-00-00-006

All that piece, parcel, or lot of land, situate, lying and being in Laurens County, State of South Carolina, being known and designated as on the Enoree River containing 117 acres, more or less being formerly bounded by lands of L.W. Gray, Carrie Coker, C.B. Redd, Jane Miller, and Enoree River, and now bounded on the North by the Enoree River, the center of which is Spartanburg County, on the East by lands now or formerly of Dorothy Lee Clayton and Rhonda Clayton, on the South by lands now or formerly of Clyde Redd, on the West by lands now or formerly of David G. Coker, and on the Northwest by lands now or formerly of Crescent Land and Timber Company. Also, a right-of-way or easements of ingress and egress 20 feet in width beginning at the southwestern most corner of the tract conveyed herewith and extending across other property of grantors in a direct line to an existing gravel road which leads to a public roadway this easement also includes the right of use the existing dirt roadway above mentioned which leads to a public roadway

Less and except portions conveyed in Deed Book 210 Page 551, Book 214-Page 236, Book 214 Page 370 and in Book 211 Page 829.

This being a portion the same property conveyed to grantors by Deed of James Redd, recorded 08-16-71 in Book 197, Page 239 in the RMC Office for Laurens County. See also Deed Book 516 Page 84 and Book 635 Page 291 for half interests to and from said grantors.

This being the same property conveyed to Wallace Lindsey Howell, Director of Kingdom Estate Trust, dated 10-18-2011, recorded 11-02-2011 in Book 1044, Page 185 in the RMC Office for Laurens County.

2. Old Plantation Road, 11.45 acres
Fountain Inn, SC 29644
Laurens County, South Carolina
Titled in the Name of: Hall Gordon & Benton Directors of The Roylin Trust
TMS# 214-00-00-039

All that piece, parcel, or lot of land, situate, lying and being in Laurens County, State of South Carolina, being known and designated as containing 11.45 acres, more or less, being more fully described in Plat Book A-417, Page 9 recorded in the RMC Office for Laurens County. Reference is hereby made to said plat for a more complete description of metes and bounds thereof.

This being the same property conveyed to Mark A. Ritchie and Michelle A. Ritchie by deed of James R. Owings, Jr. and Rebecca R. Owings, dated 03-10-06, recorded 03-13-06 in Book 774, Page 257 in the RMC Office for Laurens County.

This being the same property conveyed to Wallace Lindsey Howell, Director of Kingdom Estate Trust, dated 10-18-2011, recorded 11-02-2011 in Book 1044, Page 185 in the RMC Office for Laurens County.

C. VEHICLE:

1. 2008 Dodge Ram 2500 Quad Cab 4x4
VIN: 3D7KS28A58G108624
Previous Tag: South Carolina Tag / HQM-783
Previously Registered to: Zuniga, Jose A.
Current Tag: Arizona Tag / AZD-6645
Currently Registered to: Ronald Anthony Baker

D. PERSONAL PROPERTY:

1. (55) Fifty-Five 1oz Gold Coins

2. (1) One 1,000 oz bag of Silver

3. Foam Machine

Serial Number: A0354

Described as follows:

Coating Reactor H-XP3 Hydraulic Proportioner Package; 50 ft. heated hose, 10 ft. heated whip hose and Air-Purge, item code AP3404; Serial #A0354, with additional add-on accessories.

4. Generator

Serial Number: X1CH38791

Described as follows:

YANMAR HYW-45T6 Diesel Generator Set; Serial #: X1CH38791, with water separator kit and filter kit.

5. Welder Ranger 250 GXT with Electric Fuel Pump

Serial Number: U1120208940

6. 2008 United Trailer

VIN: 48BTE14238A097206

Series/Model: U-714 TA 35-8.5

3. If any of the property described above, as a result of any act or omission of the Defendants:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), as incorporated by 18 U.S.C. §982(b)(1) and 28 U.S.C. §2461(c), to seek forfeiture of any other property of the said Defendants up to the value of the forfeitable property described above.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A True Bill

REDACTED
FOREPERSON



WILLIAM N. NETTLES (WJW)
UNITED STATES ATTORNEY

RECORD OF GRAND JURY BALLOT

c/ 6:13-170

THE UNITED STATES V. GORDON L. HALL, ET AL.

(SEALED UNTIL FURTHER ORDER OF THE COURT)